

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA	:	
Plaintiff,	:	Case No: 2:23-CR-188
v.	:	
	:	CHIEF JUDGE SARAH MORRISON
	:	
STEPHEN CHINN,	:	
Defendant.		

MOTION TO CONTINUE SENTENCING

Now come the Defendant, Stephen Chinn, by and through undersigned counsel, and respectfully requests that the Court continue the Sentencing in this matter, currently scheduled for April 14, 2025.

Counsel for the Defendant is requesting this continuance because he needs time to work on this case. Your Honor, I have never felt so unprepared for a Sentencing Hearing in Thirty - five years of practicing law as I do for this case, at this time. Chief Judge Morrison, I have never requested a continuance for this reason, which is very hard to explain and will not request another. I am asking this Honorable Court for at least 60 days if possible.

Counsel for the Government, AUSA Emily Czerniejewski, is not opposed to this motion.

Respectfully submitted,

/s/ Larry W. Thomas
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Attorney for Defendant

1CERTIFICATE OF SERVICE

A true copy of the foregoing Motion for Continuance was electronically filed and served on all parties this 7th day of April, 2025.

/s/Larry W. Thomas
Larry W. Thomas